



Patrick S. Blacklock
County Administrator

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COUNTY OF YOLO

NATURAL RESOURCES DIVISION

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March 15, 2017

Mr. Randy Fiorini, Chair
Delta Stewardship Council
980 Ninth Street, Suite 1500
Sacramento, CA 95814

Re: Comments on Proposed Changes to Chapter 7 of the Delta Plan

Chair Fiorini:

Thank you for the opportunity to comment on the Delta Stewardship Council's proposed revisions to the Delta Plan, specifically, amendments to Chapter 7 regarding priorities for investment in Delta levees, discussed by the Council on their February 24, 2017 meeting. Yolo County has reviewed the proposed edits for consistency with the existing policies and with the locally developed Lower Sacramento – Delta North Corridor Management Framework. The following comments are offered for the Council's consideration.

- Yolo Bypass Levee Prioritization – While the proposed Chapter envisions the future expansion of the Yolo Bypass as well as the need to incorporate ecosystem enhancements within it, it does not clearly or explicitly articulate the need to highly prioritize investments in the levees which comprise the Yolo Bypass. The County strongly recommends increasing the priority for investments in levees that are features of the flood control system and serve a purpose greater than protecting a discrete area. The County offered this same recommendation nearly five years ago in its comments on the draft Central Valley Flood Protection Plan (letter to Mary Ann Hadden, California Department of Water Resources, April 20, 2012). Significant portions of the existing Yolo Bypass levee system nonetheless remain in need of repair and improvement. This is an important public safety issue that deserves Delta Stewardship Council recognition and attention in the Delta Plan (and otherwise).
- Protect Clarksburg – The County strongly recommends elevating GLIDE DISTRICT (RD 765), LISBON DISTRICT (RD 307), AND NETHERLANDS (RD-999) from the OTHER PRIORITY to HIGH PRIORITY category in the Table titled "DLIS Priorities" on Page 48. These three levee districts collectively protect the rural community of Clarksburg. Continuing to invest in levee improvements with the intent to achieve a minimum standard consistent with the rest of the Delta is critical to ensuring the long-term viability of this rural legacy community.
- Investment in the Yolo Bypass – The County is in close coordination with the US Army Corps of Engineers and the California Department of Water Resources regarding

additional flood risk reduction and ecosystem restoration improvements in the Yolo Bypass and Cache Slough Complex. The County requests Delta Stewardship Council support for improvements to and investments in the Yolo Bypass. Such a recommendation would be comparable to that included for the San Joaquin River Bypass found on Page 58 as follows, “**RR R9. Fund and Implement San Joaquin River Flood Bypass.** The Legislature should fund the California Department of Water Resources and the Central Valley Flood Protection Board to evaluate and implement a bypass and floodway on the San Joaquin River near Paradise Cut that would reduce flood stage on the mainstream San Joaquin River adjacent to the urban and urbanizing communities of Stockton, Lathrop, and Manteca in accordance with Water Code section 9613(c).”

- DWR Exception to Investment Prioritization – The County supports the provision allowing the California Department of Water Resources the ability to vary from the investment priorities established through the Delta Plan. In particular, the County supports the following sentence included on Page 32, “In awarding State funds to improve these levees, DWR may vary from these priorities when necessary to protect lives, property, or the State’s interests in water supply reliability, the Delta ecosystem, considering the Delta’s unique agricultural, natural, cultural, or recreational values. The reasons for any variations should be explained.”
- Federal Flood Risk Reduction Study Status – Chapter 7 as currently proposed includes the following inaccurate statement on Page 14, “The U.S. Army Corps of Engineers (USACE) has completed recent studies (2015) recommending improvement to the Delta’s project levees protecting Sacramento’s Pocket neighborhood. USACE studies are underway of potential improvements to Delta levees protecting West Sacramento and metropolitan Stockton and at the Yolo Bypass...” The County recommends correcting this statement to recognize Congressional authorization of both the American River (Common Features) and West Sacramento General Reevaluation Reports by the Water Infrastructure Improvements for the Nation (WIIN) Act of 2017 (P.L. 114-322). Together, these studies recommend significant improvements to urban Delta levees in both Sacramento and West Sacramento.

We appreciate the opportunity to provide input into the Delta Plan revision process and look forward to your response to the comments provided above.

Sincerely,



Supervisor Jim Provenza
District 4
Yolo County Board of Supervisors



Supervisor Oscar Villegas
District 1
Yolo County Board of Supervisors

CC: Yolo County Clerk of the Board